

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20024**

In the Matter of:	)	
	)	
Delete, Delete, Delete	)	GN Docket 25-133
Virtual AM Broadcast Stations	)	
	)	
	)	

**COMMENTS OF
KEVIN M. FITZGERALD**

Kevin M. Fitzgerald, (hereinafter “Fitzgerald”), Submits these Comments to the Notice of Proposed Rule making: “Delete, Delete, Delete”, GN Docket 25-133, regarding the implementation of a new Class of AM Broadcast radio facilities; Virtual AM Stations, Class V.

VIRTUAL AM BROADCAST STATIONS

Kevin M. Fitzgerald is a Broadcast Technical Consultant based in Scranton, PA; specializing in FM and AM Full Power Commercial and Non-Commercial and FM Translator broadcast application processing and site development and selection. Fitzgerald has designed, proposed, processed, and built many FM and AM broadcast sites over the past 35 years. Thus, Fitzgerald has much real world experience regarding this matter.

VIRTUAL AM BROADCAST STATIONS

Kevin M. Fitzgerald here suggests that the Commission consider adding a class of AM stations which is referenced here as “VIRTUAL AM” broadcast stations. These stations would represent AM stations that would change their facility type from Class B, C, or D to Class V (virtual). A virtual AM station would be required to have an FM translator station associated with it. This FM translator would be required to have its 60 dBu contour within the 25 mile circle of the AM station's last operating (before going virtual) coordinates. Additional FM translators could be associated with this Virtual AM station. Once an AM station goes Virtual it cannot go back to its previous class of operation. If an AM station is the only full power broadcast station licensed to a particular community it would not be allowed to become a Virtual AM station.

The use of the Virtual Class of AM broadcast station makes sense. One of the biggest issues with the AM broadcast band is its interference issues caused by overcrowding of the band. This proposal would eliminate a great amount of interference in the AM broadcast band by eliminating on-air AM broadcast facilities. Virtual AM broadcast stations would solve the old infrastructure problem that many current aging AM broadcast stations are suffering.

CONCLUSION

As the Commission simplifies and considers proposals to improve broadcasting services, the use of Virtual AM broadcast stations, which would support the operation of FM translators, makes common sense.

Respectfully submitted,

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